

#1466068545 \$120.00

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

FILED

2014 APR -3 PM 3:22

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

Martha Vassalle and Jerome Johnson,

Plaintiffs,

v.

Midland Funding LLC, et al.,

Defendants.

CASE NO.: 3:11-cv-0096

HON. DAVID A. KATZ

**And Related Cases:**

Case No. 3:08-cv-1434, N.D. Ohio

Case No. 3:10-cv-0091, N.D. Ohio

Case No. 3:11-cv-1132, N.D. Ohio

**MOTION OF THE  
STATE OF ILLINOIS  
FOR ADMISSION  
PRO HAC VICE OF  
PAUL A. ISAAC**

Now comes the State of Illinois, by and through undersigned counsel, pursuant to Local Rule 83.5(h) of the United States District Court for the Northern District of Ohio, and hereby respectfully moves this Court for the admission, *pro hac vice*, of Paul A. Isaac, Assistant Attorney General for the State of Illinois to appear and participate in this matter as counsel for the State of Illinois. The address for the Office of the Illinois Attorney General is 500 S. Second St., Springfield, Illinois 62706; Telephone (217) 782-4436; Fax: (217) 782-1097; email – pisaac@atg.state.il.us.

The State of Illinois wishes to appear for the sole and limited purpose of submitting an *amicus curiae* brief in this action. The State does not seek to be made a party to the above-captioned case, nor does it intend to confer jurisdiction on the Court or otherwise waive any of the sovereign immunity protections afforded to the State under the Eleventh Amendment to the United States Constitution.

An affidavit of Paul A. Isaac in support of admission *pro hac vice* is attached hereto and incorporated by reference. A proposed Order is also submitted herewith for the Court's approval and signature.

Dated: April 2, 2014

Respectfully submitted,

THE PEOPLE OF THE STATE OF ILLINOIS by,  
LISA MADIGAN, ATTORNEY GENERAL OF  
ILLINOIS

A handwritten signature in blue ink, appearing to read "Paul Isaac", is written over a horizontal line.

---

Paul A. Isaac #6300087  
Assistant Attorney General  
Consumer Fraud Bureau  
500 South Second Street  
Springfield, IL 62706  
Telephone: (217) 782-4436  
Email: pisaac@atg.state.il.us

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Martha Vassalle and Jerome Johnson,

Plaintiffs,

V.

Midland Funding LLC, et al.,

Defendants.

CASE NO.: 3:11-cv-0096

HON. DAVID A. KATZ

### And Related Cases:

Case No. 3:08-cv-1434, N.D. Ohio

Case No. 3:10-cv-0091, N.D. Ohio

Case No. 3:11-cv-1132, N.D. Ohio

## CERTIFICATE OF SERVICE

I hereby certify that on a copy of foregoing **Motion of the State of Illinois for Admission *Pro Hac Vice* of Paul Isaac** was sent by mail to the Office of the Clerk and filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's system.

Dated: April 2, 2014

Paul Lane

---

Paul A. Isaac